

REMARKS

Upon entry of the instant Amendment, Claims 1-16 are pending. Claims 1, 7, 12, and 16 have been amended to more particularly point out Applicants' invention.

Claims 1, 6, 7, and 12-16 were rejected under 35 U.S.C. 103(a) as being unpatentable over Gudjonsson et al., U.S. Patent No. 6,564,261 ("Gudjonsson") in view of Dragnich et al., U.S. Patent No. 6,560,329 ("Dragnich"), and Coulouris et al., *Distributed System Concepts and Design*, 2d. Ed. ("Coulouris"). Applicants respectfully submit that the claimed invention is not taught, suggested, or implied by Gudjonsson, Dragnich, or Coulouris, either singly or in combination.

As discussed in the Specification, embodiments of the present invention provide a system and method for adding software features to a system such as a telecommunications system including a telephony Internet server. Briefly, a dispatcher is provided for delivering messages between dispatcher clients, i.e., software subsystems that may be in the same process, a different process, or on a different machine, that may need updates, etc. The dispatcher manages a pool of threads to balance the workload. The dispatcher can process both synchronous and asynchronous messages by dispatching the message to all registered subsystems in order of their registered priority. Subsystems register for receiving predetermined messages. The dispatcher maintains a database of their destinations. The dispatcher itself needs to have no knowledge of the contents of messages that are to be sent; likewise, the sender software subsystems need have no knowledge of the corresponding destinations.

Thus, the claims have been amended to recite, generally, that the dispatcher is configured to dynamically add features and to balance workload between a packet network and a PBX.

In contrast, as discussed in response to the previous Official Action, Gudjonsson appears to relate merely to a system and method for call routing, i.e., between end

users of such devices as mobile phones. The system allows the user to manage communications using a buddy list and provides for the user to, among other things, hide personal information from other users. Gudjonsson does not appear to provide for adding software features to software subsystems, as generally recited in the claims at issue.

Similarly, Dragnich relates to a call agent system, including a call server 22. The call server 22 depends on "call arrival data intrinsic to the network," such as automatic number identification (ANI) data for routing the call. See col. 5, lines 17-27. To route the call, the controller 20 "analyzes the associated call information for matches." See col. 6, lines 45-47. Thus, like Gudjonsson, Dragnich does not appear to relate to, *inter alia*, adding software features to software subsystems.

Coulouris is relied on merely for allegedly teaching dispatching messages synchronously and asynchronously. Like Dragnich and Gudjonsson, however, Coulouris does not appear to provide for adding software features to software subsystems in a system as claimed. As such, the Examiner is respectfully requested to reconsider and withdraw the rejection of the claims.

Claims 2-5 and 8-11 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Gudjonsson, Dragnich, Coulouris, in view of Elliott et al., U.S. Patent No. 6,335,927 ("Elliott"). Applicants respectfully submit that the claimed invention is not taught, suggested, or implied by Gudjonsson, Dragnich, Coulouris, or Elliott, either singly or in combination.

Gudjonsson, Dragnich, and Coulouris have been discussed above. Elliott is relied on for allegedly teaching saving, prioritizing, and sending messages as flexible message parameters. However, like Gudjonsson, Dragnich, and Coulouris, Elliott does not appear to relate to updating a software subsystem as claimed. Thus, like Gudjonsson, Dragnich, and Coulouris, Elliott does not appear to relate to the problem solved by the present invention. As such, the Examiner is respectfully requested to reconsider and withdraw the rejection of the claims.

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For all of the above reasons, Applicants respectfully submit that the application is in condition for allowance, which allowance is earnestly solicited.

Respectfully requested,

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